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April 30, 2024

VIA ECF

Honorable Colleen McMahon
United States Courthouse
500 Pearl Street
New York, New York 10007

RE: USA v. Sandy Annabi
10-CR-0007

Dear Judge McMahon,

I write this letter to ask for reconsideration of Ms. Annabi's sentence. Since the conclusion of her case, her attorney, William Aronwald, has passed away. Although I did not represent Sandy Annabi at the trial and sentencing, I have known her family for over four decades, having represented her mother and father in the past. I have known her since she was a little girl and watched her grow up to the woman she is today.

In this particular case, Ms. Annabi was in way over her head. As you know she was sentenced to seven years incarceration. Ms. Annabi ended up doing more time than the person who seemed to be the prime target in this investigation. I do not minimize her actions, nor ask you to. I recognize she breached her position of trust and she has sorely paid for it.

Since coming out of imprisonment, her father has passed away from stomach cancer and her uncle, whom she was very close to, has also passed away. Her brother was involved in a serious accident, where he fractured his skull and is currently struggling to regain ability to function.

Ms. Annabi is making every effort to pay off the balance of her restitution; however, the amount she has been asked to pay is substantially greater than any one else in this case.

While we have attempted to settle this matter, we were advised it cannot be settled because it was deemed to be restitution; though I do not understand the concept of restitution as it applies in this particular instance. I spoke to Assistant United States Attorney Maria Cotto and she has informed me that she is unable to settle this matter as it is presently constituted. We now turn to Your Honor for your assistance.

We are at wits end dealing with this struggle. Ms. Annabi is the sole person responsible for the care and well being of her mother and her sick brother. The


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I decline
"reconsideration"
Ms. Annabi's
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circumstances are truly disastrous. We only ask for the opportunity to settle the amount. The extended family has indicated that they will help in any way they can, while recognizing there are limited resources here.

I am not used to making applications such as this Your Honor but I urge you to consider our request as a practical way of resolving this matter. It is my understanding that the other defendant in this case, was able to settle in one fell swoop and my client was not financially able to do so. I urge Your Honor to assist us. Ms. Annabi has paid her debt to society and is trying to better herself and move on with her life, however, she is unable to do so with such a heavy burden. I thank you for your consideration.

Respectfully submitted,


Murray Richman, Esq.

CC: AUSA Maria Cotto via ECF